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PLATEAU MINING COMPANY

A Subsidiary of Cyprus Coal Company
P.O. Drawer PMC Price, Utah 84501
Telephone (801) 637-2875

*file ACT/007/006 #2
Star Point*

April 10, 1987

RECEIVED
APR 13 1987

**DIVISION OF
OIL, GAS & MINING**

Mr. Lowell Braxton
Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

Re: New Lands ICR Response And Submittal Of
14 Copies Of New Lands Permit Application

Dear Mr. Braxton:

On April 9, 1987 the following were delivered to your office: Eleven (11) complete sets of the New Lands Permit Application incorporating PMC responses to the Divisions' Initial Completeness Review comments; Three (3) sets of revised text pages, maps, tables, figures and exhibits incorporating PMC responses to the Divisions' Initial Completeness Review comments to be inserted into the three New Lands Permit Application sets submitted on December 19, 1986.

This submittal is in agreement with the procedures worked out with you and your staff. Public notice of the New Lands Permit Application will start in the local papers on Tuesday, April 14, 1987, a copy of the wording is attached. Complete sets of the application will be filed at the Carbon County and Emery County Recorder's offices.

Enclosed please find five (5) copies of our responses to the Divisions' Initial Completeness Review comments on the New Lands Permit Application. As discussed above, these responses are incorporated into the eleven and three sets delivered yesterday, but to make it easy for your staff to review our response to the ICR, only our responses are given here.

As I discussed with you yesterday, the intent of our meeting on Tuesday, April 14 is to present the responses to the ICR comments to your staff members and get from them a commitment as to whether we satisfactorily answered their concerns.

If you have questions, please call.

Respectfully,

Ben Grimes
Sr. Environmental Engineer

BG:sd

Attachment/Enclosures

cc: Bob Lauman

File: ENG 2-5-2-12

Chrono: BG870402

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APR 13 1987

NOTICE OF APPLICATION
FOR PERMIT
PLATEAU MINING COMPANY

DIVISION OF
OIL, GAS & MINING

Notice is hereby given that Plateau Mining Company, P. O. Drawer PMC, Price, Utah 84501, a wholly owned subsidiary of Cyprus Western Coal Equipment Company, 7200 Alton Way, Englewood, Colorado 80112, has submitted an application to the State of Utah, Department of Natural Resources, Division of Oil, Gas and Mining, for a permit to add five new areas to it's existing permit (ACT/007/006) to mine under the provisions of the Utah Coal Mining and Reclamation Act (Utah Code Annotated 40-10-1 et. seq.) and the Utah Coal Program Regulation UMC 770. The permit area is located in Carbon and Emery Counties, Utah as follows:

Township 15 South, Range 7 East, SLBM

Section 1, portion; Section 2, portion; Section 11, portion;
Section 12, all; Section 13, portion; Section 14, portion;
Section 23, all; Section 25, portion; Section 26, portion.

Township 15 South, Range 8 East, SLBM

Section 5, portion; Section 6, portion; Section 7, all;
Section 8, portion; Section 9, portion; Section 10, portion;
Section 11, portion; Section 15, portion; Section 16, all;
Section 17, portion; Section 18, portion; Section 20, portion;
Section 21, portion.

The project area is shown on the following U. S. Geological Survey 7.5 - Minute Quadrangle Maps: Pinnacle Peak, Wattis and Hiawatha.

Copies of the permit application which are available for public inspection are located at the following:

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
III Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Carbon County Recorder's Office
Carbon County Court House
Price, Utah

Emery County Recorder's Office
Emery County Court House
Castle Dale, Utah

Pertinent comments are solicited from anyone affected by this proposal.
Comments should be filed within the next thirty (30) days with:

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
III Triad Center, Suite 350
Salt Lake City, Utah 84180-1203



UMC 771.23(e)(1) (PGL)

"A "permit area" map . . . must be submitted."

DIVISION OF
OIL, GAS & MINING

Response

The response to UMC 771.23(e)(1) on Page 771-17 of the PAP will be revised to read:

Maps which are intended to cover areas of large areal extent will generally be at a scale of 1:12,000 (1" = 1,000 ft.) and will include the information generally available on U.S. Geological Survey (USGS) maps. Maps of smaller areas will be at an appropriate scale to provide sufficient detail for review. The permit area can be seen on Map 71, Permit Area Map. Map 1, Pre-Law Mining Activities, Hiawatha Seam, Third Seam, and Wattis Seam, delineates the areas mined prior to August 3, 1977.

UMC 782.13(a)(2) (PGL)

"The property shown . . . in the permit area."

Response

The permit boundary was revised to "block out" and simplify the boundary in Sections 9, 10, and 15, T15S, R8E. The idea is to simplify the boundary and to include all rights-of-ways within the boundary. UMC 782.13(a)(2) calls for the names of the owners of areas to be affected by surface operations and coal owners; it does not require that all land included within a permit boundary be covered by rights-of-way or other land control document in the name of the operator.

According to Mr. Mark Mackiewicz of the BLM Office in Price (personal phone conversation 3-11-87 with Ben Grimes), there are at least three other mines in the area that have done the same thing: Kaiser Coal, Soldier Creek, and Andalex Resources. None of them have rights-of-ways on all of the permit area. According to Mr. Mackiewicz, BLM has no problem with this situation. Therefore, PMC proposes leaving the permit boundary as shown on Map 71, Permit Area Map.

UMC 783.14 (RVS)

"The application must . . . development waste rock."

Response

This is being addressed in response to Permit Renewal Stipulation 783.14-(1) and Stipulation 817.71-.83-(1); the information requested will be submitted to the Division on August 1, 1987.

UMC 783.17 (RVS)

"The application must . . . underground sources of water."

Response:

The response to UMC 784.14(c) as revised in the New Lands Submittal on Page 784-92 will have the following added after the first paragraph:

Springs in Section 18 as shown on Map 72, Spring-Mining Correlation Map, that may be affected by subsidence include: 227, 228, 229, 238, 493, 496, 497, 498, 499, 500, 240, and S18-2. Of these, Spring 228 had a flow during the 1986 inventory of 9 GPM; Spring 229, 12 GPM; Spring 238, 4 GPM; Spring 500, 3 GPM; Spring 240, 2 GPM; and Spring S18-2, 9 GPM. All of the rest had flows less than 1 GPM each. Springs 229, S18-2, and 500 will be monitored for mining impacts. If subsidence causes hazardous conditions which make it unsafe to monitor any spring, PMC will notify the Division immediately and discontinue monitoring.

The response to UMC 783.17 on Page 783-66 of the Permit Renewal PAP will be revised. The following will be added after Item No. 6:

If subsidence in Section 18, T15S, R8E, causes material damage to spring flows or quality, springs in the vicinity may be developed to increase their flow to replace water lost or guzzlers may be installed to provide water for wildlife and cattle. These springs include No.'s 236, 237, 491, 492, 501, and 502.

UMC 784.12 (PGL)

"Are there any . . . Please clarify."

Response:

A small corral and shed are located in Section 10, T15S, R8E. These have been added to Map 44, Surface Facilities, and Table 67, Existing Structures.

UMC 784.14(a)(4) Addition by PMC

The following addresses the revision of the mining layout since the submittal of the New Lands PAP.

The following will be added to the response to UMC 784.14(a)(4) on Page 784-62a of the New Lands PAP as revised 12/15/86 after the first full paragraph:

Since the preparation of Exhibit 30, Prediction of Subsidence Due to Two-Seam Mining in Section 18, geologic data from drill holes 86-18-1, 86-18-2, and 86-18-3 on the interior of Section 18 and data made available by U.S. Fuel Company have been evaluated and interpreted. This interpretation revised the two mineable coal seams in regard to seam thicknesses and geotechnical aspects.

Additional mine planning and evaluation of mineability and equipment constraints have necessitated a revision of the mine layout and sequencing within Section 18. The longwall panels and associated development mining have been rotated seven degrees to align east-west. In addition, instead of starting longwall mining at the south side of the reserve and working successive panels to the north, we will start at the north side of the reserve and work successive panels to the south.

The revised mine layout as shown on Map 5, Mine Plan - Third Seam, and Map 6, Mine Plan - Wattis Seam, incorporates the 400 foot minimum cover and 480 foot minimum cover addressed above.

Prediction of subsidence has been revised taking into consideration the current mine layout. Figure 38, Subsidence Prediction - Mining Wattis Seam, and Figure 39, Subsidence Prediction - Mining Wattis Seam and Middle Seam, show predicted subsidence.

UMC 784.14(b)(3) (RVS)

"The application must . . . mining-induced subsidence."

Response:

The response to UMC 784.14(b)(3) as revised in the Permit Renewal Initial Completeness Review response on Page 79 will be revised as follows:

"Historically, ground water samples...not occur until after the year 1991."

The selection of spring locations for inclusion in the ongoing monitoring program is the result of careful consideration of location, flow, lithology, potential for subsidence and current spring development. In general, an attempt was made to select developed springs with higher yields which were representative of the differing lithologic and aquifer characteristics of the area. A summary of these items for each spring selected as a proposed monitoring site is shown in Table 90, Spring Characteristic Summary.

The selection of springs was governed by the desire to provide a broad data base. Proposed monitoring locations include some springs above old, new and future mine workings such as Springs S7-1, S17-2, 452, S18-2, 229, 500, and 753, some adjacent to potentially impacted areas such as S11-1, S14-9, 748, 751, and 978, and some well outside the mine permit boundary such as Spring 530 and 734 and wells 85-35-1, 86-35-2 and 86-35-3. The diversity of spring locations will allow for monitoring of both pristine areas as well as areas potentially impacted by subsidence. Higher yield characteristics of those springs chosen will also allow for continuity of sampling and provide a stronger assurance that continued sampling will be possible during drought

years or during low flow fall periods. The proposed locations for some of the spring sampling as shown on the table and in the map previously referenced were revised by DOGM prior to preparation of the PAP.

Spring S18-2 which has been monitored for years will be directly above mining in Section 18, T15S, R8E, and will provide data on possible impacts from longwall mining. Springs 229 and 500 were selected because they too are above future mining in Section 18, T15S, R8E. If subsidence causes hazardous conditions which make it unsafe to monitor any spring, PMC will notify the Division immediately and discontinue monitoring.

"With the exception of...Operational Monitoring will be Implemented."

Map 31, Ground and Surface Water Monitoring Stations, and Table 80, Ground and Surface Water Monitoring Stations With Proposed Schedule When Baseline and Operational Monitoring Will Be Implemented, have been revised to show Spring 500. Section 18, T15S, R5E, therefore has three spring locations that will be monitored for mining impacts, S18-2, 500 and 229. Data from these sources by the above revision have been incorporated into the monitoring and reporting plans as discussed in the PAP.

UMC 784.14(c) Addition by PMC

The following addresses the revision of the mining layout since the submittal of the New Lands PAP.

The second full paragraph on Page 784-10 of the New Lands PAP will be revised as follows:

The above referenced report indicates that there are two potential locations in the stream channel of the North Fork of the Right Fork of Miller Creek where shallow surface cracks could develop. The first (Point A) is located in the channel near the eastern edge of proposed excavation for a central longwall panel in the Wattis Seam, at elevation 8,900 feet MSL. The second (Point B) is located in the channel near the southern edge of longwall mining in the Third Coal Seam (see Figure 1 of the above referenced report for locations). Since the preparation of Exhibit 30, Prediction of Subsidence Due to Two-Seam Mining in Section 18, the mine plan has been revised as shown on Map 5, Mine Plan - Third Seam, and Map 6, Mine Plan - Wattis Seam. Prediction of subsidence has been revised as shown on Figure 28, Subsidence Prediction - Mining Wattis Seam, and Figure 39, Subsidence Prediction - Mining Wattis Seam and Middle Seam. Points A and B are shown on Figure 39 in the same relative position as shown on Figure 1 in Exhibit 30. Should these fractures intercept existing open fracture systems within the formation, some surface water could be lost to the ground water system. However, since as discussed in response to Section 783.15, the North Fork of the Right

Fork of Miller Creek through this reach is a gaining reach of stream, it is anticipated that these shallow surface cracks would merely fill with water without acting as a conduit to remove water from the system; or since drainage systems are often formed at weak/jointed surface locations, it is likely that surface water lost to existing fractures would travel down the fractures and issue back into the drainage system downstream, particularly if mudstones are present at the base of such cracks.

UMC 784.19 (PGL)

"The sampling of . . . dated February 9, 1987)."

Response:

This is being addressed in response to Permit Renewal Stipulation 783.14-(1) and Stipulation 817.71-.83; the information requested will be submitted to the Division on August 1, 1987.

UMC 784.20 (RVS)

"The application proposes . . . for implementing mitigative action."

Response:

Responses to the Division's concerns need to be prefaced with a restatement of the basic determinations regarding subsidence in Section 18:

- 1) According to J.F.T. Agapito and Associates (1986), who estimated subsidence and stream channel effects from longwall mining within Section 18 (see Exhibit 30, Prediction of Subsidence Due to Two-Seam Mining in Section 18), mining should not cause cracks that reach the surface where 400 feet of cover exists above single seam mining and 480 feet of cover above two-seam mining.
- 2) Mining has been planned to be restricted to areas where the minimum cover above single seam mining will be 400 feet and the minimum cover above two-seam mining will be 480 feet.
- 3) According to J.F.T. Agapito and Associates (Exhibit 30), shallow surface cracks (less than 35 to 50 feet deep) may result, but water which may enter these cracks from the stream should not be lost to the mine or it should follow fractures down gradient and re-enter the stream.
- 4) Potential exists to divert some spring flows in the Castlegate Sandstone and Lower Price River Formation area as a result of subsidence, but underlying shale and mudstone formations should act as aquitards to prevent water loss to lower formations. Water from these diverted springs will not be lost to the system but only moved in location. The potential exists that subsidence may increase these spring flows by opening up the strata making the water carrying conduits larger.

- 5) Water lost to the mine as base flow as a result of subsidence is predicted to be five GPM or less.
- 6) Stream flow in the subsidence area was 37 GPM on July 2, 1986. Later flow measurements indicate a 16 percent drop in the flow to 31 GPM on October 13, 1986. These flows are approximately 30 percent of the total flow from the NFRF of Miller Creek.
- 7) The stream channel in the potential subsidence zone is extremely steep, averaging 34 percent slope with sideslopes averaging 80 percent. In this zone, riparian habitat is non-existent because of the steepness of the canyon and the lack of soil bordering the stream. The streambed is on solid rock, having eroded through the strata to bedrock, and the sideslopes are so steep, water saturation into soils bordering the stream is impossible. The steepness of the canyon provides relief down gradient for water in the streambed, preventing sedimentation and associated riparian vegetation.
- 8) Below the mining zone, the stream channel is somewhat less steep, averaging 17 percent with steeper stretches and flatter stretches where small amounts of riparian vegetation exist. Sideslopes still average 80 percent in this zone. In the areas where riparian vegetation exists, the stream averages 3 feet in width and the entire riparian zone averages 12 feet in width. In essence, there is no riparian habitat.
- 9) Of the springs lying in the potential subsidence zone, Spring S18-2 had a flow of 9 GPM during the 1986 inventory; 500, 3 GPM; 240, 2 GPM; 238, 4 GPM; and 229, 12 GPM. The rest had flows of less than 1 GPM each. None of the springs in the potential subsidence zone have water rights associated with them.
- 10) PMC has formulated a mitigation plan which has been approved by U.S. Fuel Company (Exhibit 43), for water that may be lost from the stream as a result of mining. U.S. Fuel Company holds the only water right on the reach of stream where subsidence potentially could affect flow.
- 11) Condition 8(g) of the Coal Reserve Sales Agreement between PMC and U.S. Fuel Company dated December 13, 1985, states:

Plateau will take all reasonable action to protect and preserve the surface of the Property with maximum resource recovery, recognizing current and future surface utilization. However, the parties also recognize that Plateau's mining procedures may result in subsidence of the surface of the Property and, provided that Plateau complies with all laws, rules, regulations and its Mine Permit or Permits issued thereunder, U.S. Fuel for itself and its successors and assigns hereby consents to such subsidence and releases Plateau from liability for damages resulting from such subsidence.

Response - Item 1:

The response to UMC 784.20(b)(3)(v) as revised in the New Lands PAP on Page 784-140 will be revised by adding the following after the first paragraph:

Before longwall mining in Section 18, T15S, R8E, begins, PMC will take photographs of the stream channel in the potential subsidence zone to document pre-subsidence conditions. Photographs will be taken at 100 foot intervals in the stream channel through the barrier zones where subsidence affects would be manifest. Copies of these photographs with location map will be submitted with PMC's subsidence monitoring report for 1987.

Response - Item 2:

The revised response to UMC 784.14(a)(4) as shown in the response to the New Lands PAP on Page 784-62a will be revised as follows in the second full paragraph:

To further avoid potential impacts to the ground water system from the shallow surface cracks referenced above, PMC will inspect the stream channel of the North Fork of the Right Fork of Miller Creek during the season when access is possible (June and October). Water monitoring at Station ST-1 at the forks below the potential subsidence zone will give an indication of water loss due to subsidence if it occurs. Station ST-1 is included in our water monitoring plan and will be monitored monthly from June through October. If monitoring reveals surface cracks which divert stream flow, PMC will seal the cracks in the stream channel with bentonite or other environmentally safe materials to effectively prevent water loss.

The revised response to UMC 784.21(a)(1) on Page 784-145 in the Response to the Permit Renewal Initial Completeness Review will be revised in the second paragraph under Mitigation and Management Plans:

To further avoid potential impacts to the ground water system from the shallow surface cracks referenced above, PMC will inspect the stream channel of the North Fork of the Right Fork of Miller Creek during the season when access is possible (June and October). Water monitoring at Station ST-1 at the forks below the potential subsidence zone will give an indication of water loss due to subsidence if it occurs. Station ST-1 is included in our water monitoring plan and will be monitored monthly from June through October. If monitoring reveals surface cracks which divert stream flow, PMC will seal the cracks in the stream channel with bentonite or other environmentally safe materials to effectively prevent water loss.

The response to UMC 784.20(b)(3)(v) as revised in the New Lands PAP on Page 784-140 and as discussed under response to Item 1 above will have the following added:

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Response - Miller Creek Item 2:

The following will be added to the response to UMC 784.21(a)(1) on Page 784-145a of the 5 Year Permit Renewal ICR Response after the fourth line:

The Mudwater Canyon discharge point is a NPDES point source, therefore, analysis of a full suite of trace elements in the water discharged is not available. However, data from monitoring for NPDES parameters has been summarized and analyzed. This information is summarized in Table 92, Mine Water Quality Evaluation for Cattle and Wildlife. The Table lists the recommended EPA standards for wildlife as taken from EPA (1973) and EPA (1976).

As can be seen in Table 92, pH, Iron, and Manganese are well below the EPA standards. Oil & Grease and Total Suspended Solids levels are very low with no potential for adverse affects to cattle and wildlife. Although Total Dissolved Solids (TDS) levels have increased significantly over the past year, the level discharged is still no higher than the receiving stream which is utilized by cattle and wildlife with no adverse affects. We believe the TDS level has peaked and will not become a problem.

Water discharged from the mine could mitigate for water which may be lost due to mining in Section 18 beneath the North Fork of the Right Fork of Miller Creek. PMC has proposed this as an alternative in Exhibit 38, Water Rights Mitigation Plan.

The following will be added to the response to UMC 784.21(a)(1) as revised in the Permit Renewal Response to Initial Completeness Review on Page 784-145a:

As mitigation for wildlife, water discharged from the mine may be utilized as mitigating impacts to springs and/or stream flow lost due to mining in Section 18 beneath the North Fork of the Right Fork of Miller Creek. Details of the method of delivering mine water to the stream channel can be seen in Exhibit 43, Water Rights Mitigation Plan. Details of the plan, which can apply to mitigation for wildlife as well as mitigation for water rights, are as follows: During mining near the stream channel, a horizontal hole can be drilled to the surface near the stream channel bottom. Water from within the mine will gravity flow from the mine to the surface where it will enter the channel. The dip of the coal seam is favorable for this scenario, therefore allowing water inflowing to the mine to collect in the low area where it will flow to the surface.

Response - Raptors - Items 1 and 2:

The response to UMC 784.21(b)(3) on Page 784-147 of the New Lands PAP will be revised as follows:

Cliffs exist in the area which are utilized by raptors. Annual searches are made of these cliff faces for evidence of raptor use. Mining beneath two golden eagle nests on a cliff face in Section 18, T15S, R8E (Nos. 20 and 21) may cause subsidence as predicted in Exhibit 30, Prediction of Subsidence Due to Two-Seam Longwall Mining in Section 18, and as revised on Figure 38, Subsidence Prediction - Mining Wattis Seam, and Figure 39, Subsidence Prediction - Mining Wattis and Third Seams.

Monitoring of golden eagles, nesting activity, and cliff effects as a result of mining will be monitored and mitigated according to the plan detailed in Exhibit 41, Golden Eagle Cliff Nesting and Subsidence Monitoring and Mitigation Plan. The plan is in the review process with the U.S. Fish and Wildlife Service and the Utah Division of Wildlife Resources, the eagle regulatory authorities. When the plan is finalized, a copy will be forwarded to the Division for inclusion into PMC's Permit. Commitments made in the final plan will be held as binding upon PMC. The copy included with this submittal is in draft form only.

The only information available that PMC could find on the effects of mining on cliff faces and eagle nests was a monitoring report from Utah Power and Light Mining Company for the year 1986. UP&L Mining Company is currently longwall mining beneath the Castlegate Sandstone cliff face in Newberry Canyon at the Cottonwood-Wilberg Mine. Their data shows some movement of the cliff top and spalling of cliff face. Conditions at the UP&L site are vastly different from those at PMC and little correlation or prediction of mining effects can be made at PMC at this time.

Paragraphs 2, 3, and 4 of the response to UMC 784.21(b)(3) on Page 784-147 of the New Lands PAP will be deleted.

Response - Item 3:

"Interior" refers to a location within the panels from end to end. Figure 38, Subsidence Prediction - Mining Wattis Seam, and Figure 39, Subsidence Prediction - Mining Wattis and Third Seams, show the locations of the eagle nests.

UMC 784.23 (PGL)

"(b)(2) The area . . . "new lands" added."

Response:

Disturbed areas for which a bond is posted are shown on Map 34, Sheets 5, 6, and 8.

"(b)(11) The cross . . . at least 2 more."

Response:

Response to this concern will be submitted with the response to Stipulation 817.150-.176-(1)-PGL, to be submitted on July 1, 1987. This road is being included in the stipulation response to update the plans currently existing.

UMC 817.43 (TM)

"Complete surface water . . . sediment trap designs."

Response:

Ditch 27 referred to on Page 784-74a in the New Lands Application was given the wrong number. A Ditch 27 previously existed in the Unit Train Silo Area. Map 43 has been revised to show drainage controls to cover the existing road and Table 76, Diversion Ditch Peak Flow Design Data, has been revised to include Ditches 43, 44, and 45, which will be necessary to control run-off from the road area. Table 77, Diversion Ditch Design Criteria, has been revised to include these facilities.

The text on Page 784-74a of the New Lands PAP will be revised as follows:

The addition of the new parcels of land to the permit area described in UMC 783.13 does not impact the overall surface drainage patterns or runoff conveyance facilities (with the exception of the addition of three short ditches) because no new surface disturbed areas exist or are presently proposed that are not already shown in the current runoff conveyance plan. The short ditches, No's. 43, 44, and 45, are to be designed and placed along an existing access road to Sediment Pond No. 4 located in Section 10, T15S, R8E, and will collect runoff from the road. Two small sediment traps or silt fences will also be constructed to receive the ditch flows thereby reducing sediment contributions from the existing road to downstream areas. Surface drainage patterns and characteristics in the other three added parcels will remain unchanged.

As discussed in response to UMC 817.45 on Page 21 of the Permit Renewal Initial Completeness Review Response, the following will be added to the response to UMC 784.16 on Page 784-121 of the PAP at the end of the second full paragraph:

The sediment traps are not designed structures but are intended to enhance operation of the sediment ponds. By placing them in ditches leading to sediment ponds, sediment is removed from water flowing to the ponds, thus making the ponds more effective. The traps can easily and quickly be cleaned of sediment. They vary in size but are generally less than 3,000 square feet and have an average depth of 4 feet. They are equipped with an overflow

culvert or a spillway channel. When they become silted in, they are cleaned out with loaders or a backhoe to make them functional again.

UMC 817.44 (TM)

"The application must . . . for Ditch No. 27."

Response:

Reclamation is addressed in response to UMC 784.13 in the Permit Renewal PAP.

UMC 817.48 (DD)

"The findings in . . . has been submitted."

Response:

Refer to response to UMC 783.14.

UMC 817.71-.74 (PGL)

"See 784.19"

Response:

See response to UMC 784.19.